

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v	)	No. 20 CR 425
MARK YAMPOL,	)	Judge John Z. Lee
Defendant.	)	

**UNOPPOSED MOTION TO MODIFY**  
**CONDITIONS OF PRETRIAL RELEASE**

MARK YAMPOL, (“Mr. Yampol”) respectfully moves this Court, unopposed, to enter an order modifying the conditions of his pretrial release, specifically, by allowing him to remain in the state of Colorado until on or before September 30, 2022 and thereafter, allowing for his travel and permanent relocation to Minneapolis, Minnesota. In support of his motion, Mr. Yampol states as follows:

1. On July 29, 2022, the Court granted Mr. Yampol’s unopposed motion to modify his conditions of bond by allowing him to travel from Missouri to Colorado from August 3, 2022 through August 6, 2022; then remain in Colorado from August 6, 2022 through September 3, 2022; and then travel from Colorado to Minnesota for permanent relocation after September 3, 2022. [Dkt. #72].

2. While in Colorado, Mr. Yampol confronted significant health issues which required his being hospitalized. He is now undergoing rehab there and he requires additional medical attention which he intends to receive from his healthcare providers located in St. Louis, Missouri (where his conditions of release allow for his travel).

3. Therefore, Mr. Yampol respectfully requests that he be further allowed to travel and remain in Colorado until on or before September 30, 2022 in order that he may address his immediate medical issues, and that the Court modify his conditions of release accordingly.

4. Mr. Yampol's undersigned counsel has consulted with his Pretrial Services Officer, and the government, who have advised that they have no objections to this motion to modify his pretrial release conditions as indicated.

WHEREFORE, Mr. Yampol respectfully requests that the Court enter an order modifying his conditions of his pretrial release by allowing him to travel and remain in the state of Colorado until on or before September 30, 2022 and thereafter, allowing for his travel and permanent relocation to Minneapolis, Minnesota, and for any other relief that this Court deems proper and necessary.

Respectfully submitted,  
MARK YAMPOL

By: /s/ Nicholas G. Grapsas  
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**CERTIFICATE OF SERVICE**

I, Nicholas G. Grapsas, an attorney, certify that on September 1, 2022, I filed this pleading with the electronic case filing system of the Clerk of Court, and that all parties registered therewith and entitled to be served with same, were so served.

**/s/ Nicholas G. Grapsas**